



WHISTLEBLOWER POLICY **(Revised February 2022)**

I. Purpose

Copper Mountain Mining Corporation (the “**Company**”) is committed to conducting its business with honesty and integrity, and to complying with its corporate governance policies, including the Company’s *Code of Business Conduct and Ethics* (the “**Code of Conduct**”). Unfortunately, from time to time, it is possible that violations or deviations from these standards may occur. In such cases, the Company has a responsibility to properly investigate and, where appropriate, report such violations or deviations and the actions that have been taken to address them.

The purpose of this Whistleblower Policy (this “**Policy**”) is to:

- establish procedures for employees of the Company to report any violations or potential or suspected violations of the Code of Conduct, any applicable laws, rules or regulations and any applicable accounting, auditing and securities requirements; and
- ensure that employees can make such reports and be confident that such reports will be heard and appropriately investigated without fear of retribution.

II. Scope

This Policy applies to any violations or potential or suspected violations of the Code of Conduct, any applicable laws, rules or regulations and any applicable accounting, auditing and securities requirements involving the Company’s employees as well as directors, shareholders, consultants, vendors, contractors and/or any other parties in a business relationship with the Company.

III. Whistleblower Program

Reporting Procedure

If concerns exist about matters which are ethically questionable, incorrect, misleading or fraudulent, employees are urged to come forward with such concerns regardless of the position of the person or persons responsible for the subject of the concern. Consideration should first be given to raising the concern directly with the individual employee, the employee’s manager, or members of the local management team.

If an employee has a concern or complaint regarding a violation or potential or suspected violation, he or she may submit such report by the following means:

- By email: compliance@CuMtn.com
- By letter/mail/courier to the Chair of the Audit Committee addressed as follows:

PRIVATE AND CONFIDENTIAL
Attn: Chair of the Audit Committee
Copper Mountain Mining Corporation
Suite 1700 – 700 West Pender Street
Vancouver, British Columbia V6C 1G8

Employees may submit any report on a confidential and anonymous basis. All reports should contain as much specific information as possible so that a reasonable investigation can be conducted.

Confidentiality

The Company will treat any report made pursuant to this Policy as confidential to the fullest extent permitted by law. The Company will exercise particular care to keep an employee's identity confidential until a formal investigation is launched. Thereafter, an employee's identity may be kept confidential, if requested, unless such confidentiality is incompatible with a fair investigation or unless such disclosure is required by law. In such instances, the employee making the report will be so informed in advance of being identified. It is important to note that while the Company will take all reasonable steps to maintain an employee's anonymity, the source or nature of the report and steps taken to investigate it may, as a practical matter, make it difficult to maintain such anonymity.

Investigation of Reports

Upon receipt of a report of a violation or potential or suspected violation, such report will be forwarded to the Vice President, General Counsel and Corporate Secretary. The Vice President, General Counsel and Corporate Secretary will then evaluate and determine whether a reasonable basis exists for commencing an investigation into the report, and will promptly notify the Chair of the Audit Committee of the report. The Chair of the Audit Committee will oversee the investigation and treatment of any report involving the Company's accounting, auditing, internal controls over financial reporting or disclosure controls or procedures, and the Vice President, General Counsel and Corporate Secretary will oversee the investigation of all other reports. The Vice President, General Counsel and Corporate Secretary or the Chair of the Audit Committee, as applicable, may retain independent legal counsel, accountants or others to assist with the investigation in accordance with this Policy.

Following such investigation, the report will be brought to the attention of the full Audit Committee at its next scheduled meeting. The Audit Committee will then determine, with the input of the Company's management, the appropriate corrective action to be taken, if any.

Employee Protection

No individual who, in good faith, submits a report under this Policy will suffer harassment, retaliation or adverse employment consequences as a result of doing so. Any director, employee or consultant of the Company who retaliates against someone who has made a report in good faith will be subject to discipline up to and including termination of their employment or consulting arrangement.

Acting in Good Faith

Any individual who reports a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to have been made maliciously or in bad faith, or were knowingly false, will be viewed as a serious disciplinary offense. Any director, employee or consultant of the Company who submits a report on such a basis will be subject to discipline, up to and including termination of their employment or consulting arrangement.

Retention of Records

The Company will maintain a record of all concerns or complaints received, tracking their receipt, investigation and resolution. These records will be retained for a period of time required by applicable laws, rules and regulations.

IV. Questions About This Policy

Should employees have any questions or concerns regarding this Policy, please contact the Company's Vice President, General Counsel and Corporate Secretary.